

**UNITED STATES DISTRICT COURT**  
for the  
Eastern District of Michigan

United States of America

v.

Tivon JAQUESS JR

Case No.

Case: 2:22-mj-30407

Assigned To : Unassigned

Assign. Date : 9/21/2022

CMP USA V JAQUESS (LH)

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 11, 2022 in the county of Wayne in the  
Eastern District of Michigan, the defendant(s) violated:

*Code Section*  
18 U.S.C. § 922(j)

*Offense Description*  
Knowingly Possessing Stolen Firearms

This criminal complaint is based on these facts:

See attached Affidavit

☐ Continued on the attached sheet.


Sworn to before me and signed in my presence  
and/or by reliable electronic means.

Date: September 21, 2022

City and state: Detroit, MI

  
Complainant's signature

Special Agent Sherri Reynolds, ATF  
Printed name and title

  
Judge's signature

Hon. Anthony P. Patti, United States Magistrate Judge  
Printed name and title

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

I, Sherri Reynolds, being first duly sworn, hereby depose and state as follows:

1. I am a Senior Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF), United States Department of Justice, and have been so employed since December of 2009. I am currently assigned to the Detroit Field Division. I completed twenty-six weeks of training, which was comprised of the Criminal Investigator Training Program and the ATF Special Agent Basic Training program at the Federal Law Enforcement Training Center in Glynco, Georgia. I received extensive training on firearms identification, common scenarios involving firearms and narcotics trafficking, and identification and effects of controlled substances. Additionally, I received training on undercover investigations related to firearms and narcotics trafficking, which included investigative techniques and common subject behavior.

2. During the course of my employment with ATF, I have investigated criminal violations relating to firearms, firearms trafficking, burglaries from FFLs, explosives, arson, violent crime, criminal street gangs and narcotics. I have participated in all aspects of criminal investigations, including, but not limited to, interviews, physical surveillance, and the execution of search warrants. I have personally investigated and/or assisted other agents and officers in their

investigations involving violations of 18 U.S.C. § 922(a) (1)(A) (engaging in the business of manufacturing and/or distributing firearms without a license), 18 U.S.C. § 922 (j) (illegal possession of firearms), 18 U.S.C. § 922 (u) (theft of the firearms from a Federal Firearms Licensee), 18 U.S.C. § 924(c) (use of a firearm in furtherance of a drug trafficking offense) and 26 U.S.C. § 5861(d) (engaging in the manufacturing of firearms required to be registered in the National Firearms Registration and Transfer Record). I am familiar with, and have participated in, conventional investigative methods, including, but not limited to, electronic surveillance, visual surveillance, the use of GPS/E-911 data, questioning of witnesses, search warrants, confidential informants, and pen registers and trap and trace devices. I have also participated in multiple T-III investigations as a case agent, a monitor, and as a member of the surveillance team.

3. During the course of my employment with ATF, I have had the opportunity to converse with admitted and known firearms traffickers as to their methods, and those of their associates, regarding the manufacture, importation, transportation, distribution and sales of firearms, as well as their methods used to conceal, transport, and launder cash and/or other types of firearms trafficking proceeds. I have also interviewed individuals who were involved in FFL burglaries and the planning of the burglaries. I am familiar with the methods individuals involved in said conspiracies use to distribute the firearms after the

theft has occurred. I have become knowledgeable in the methods used by firearms traffickers to import, conceal, transport, distribute, manufacture, and sell firearms, as well as the methods used to conceal, transport, and launder cash and/or other types of firearms trafficking proceeds. Through prior investigations and training, I have become familiar with the types and amounts of profits made by firearms traffickers, and the methods, language, and terms used by persons dealing in illegal sale of firearms.

4. The facts contained in this affidavit come from my personal observations, my training and experience, my review of documents and statements, information obtained from other law enforcement officers, and individuals with knowledge of this matter. This affidavit does not provide every detail I know regarding this investigation.

5. Based on ATF's investigation in this case, there is probable cause showing Tivon JAQUESS JR. violated Title 18 U.S.C. § 922(j) (Knowingly Possessing Stolen Firearms), as discussed below.

#### **Probable Cause**

6. On September 11, 2022, at approximately 4:31 am, a Kia SUV, that was reported stolen that same day, crashed through the front of the Freedom Holster Gun Shop, a Federal Firearms Licensee (FFL), located at 1310 S. Wayne Road, Westland, MI, 48186. I reviewed the video from surveillance cameras from

the FFL and approximately seven unknown individuals rushed into the FFL and were observed grabbing multiple firearms seconds before exiting the FFL (see exhibits 1 and 2). The FFL estimate approximately fifty firearms were stolen. The unidentified individuals exited through the front and ran eastbound towards Hazelwood Street. It appears the unidentified individuals were wearing facemasks, gloves, long sleeved shirts, and some were in possession of a bag. The individuals were inside the FFL for less than one minute.

7. As a part of this investigation, ATF agents reviewed a number of social media posts. SA Dent compared one of the individuals depicted in the photographs as Instagram user “x.dizzlevon” in the account’s images and videos to a Michigan Secretary of State image of Tivon JAQUESS, JR. and identified JAQUESS, JR. Since JAQUESS JR is identified in multiple photographs on this Instagram account, it is believed as the individual depicted in the images and videos such that there is probable cause to believe that the “x.dizzlevon” account belongs to JAQUESS, JR.

8. SA Dent observed JAQUESS, JR.’s Instagram. In his posts, JAQUESS JR. uses the hashtag “#OGE.” ATF has been informed by members of the DPD Gang Intelligence Unit that OGE is the acronym for Omar Gabrielle Earl, a street gang in Detroit. ATF believes JAQUESS’ use of his tags signifies his

affiliation with the group. Further, DPD gang intel has validated JAQUESS as an associate of OGE.

9. On September 19, 2022, SA Dent observed a post published to the “34.lux” account on Instagram “3 days ago,” which leads me to believe the post was published on September 16, 2022. The account of “34.lux” is believed to be associated with a co-conspirator in this investigation who had possession of one of the stolen firearms. The post is publicly available and includes seven photographs. In the photos, JAQUESS, JR. is depicted wearing an “ANTI SOCIAL SOCIAL CLUB” black hooded sweatshirt and a hat with the text “GOVERNMENT IS WAR” on the front. In several of the photos, JACQUESS, JR. is holding what appears to be an AK variant firearm. There were multiple AK variant firearms stolen in both the Dearborn and Westland burglaries that match the characteristics of the firearm JAQUESS JR. is holding in the Instagram photograph. Below are excerpts of those pictures:



Exhibit 5

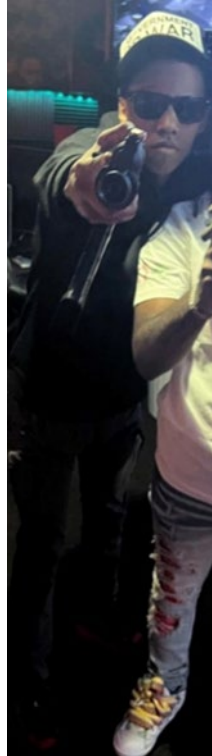


Exhibit 6



Exhibit 8

10. On September 19, 2022, ATF agents conducted surveillance of JAQUESS JR.'s residence on Forrer Street. While conducting surveillance, agents observed JAQUESS JR. entering and exiting the residence. On one occasion, JAQUESS JR. took out the trash from the residence.

11. On September 20, 2022, ATF agents executed a warrant at JAQUESS JR.'s residence on Forrer Street in Detroit. Agents located two adult males and two juveniles in the basement. JAQUESS JR. was not home at the time of the warrant, but information was provided to ATF that JAQUESS JR. does in fact reside at this location. Agents found one firearm on a dresser and six firearms split between two

backpacks. Four of these firearms were reported stolen from the Westland burglary. The stolen firearms include:

- Arms Corp Philippines, STK100, 9m caliber pistol bearing the serial number: RIA2332766 (this firearm has a serial number that has attempted to be obliterated).
- Glock, model 22, 40 caliber pistol bearing serial number: BVKX282.
- Springfield XD 9, 9m caliber pistol, bearing the serial number: BA593586.
- FN, model 509, 9m caliber pistol bearing serial number: GKS0199169.

Other firearms (two of which had obliterated serial numbers) located in the basement of the residence include:

- Glock model 22 gen 5, .40 caliber pistol bearing serial number: BXAE190.
- Rohrbaugh, model R-9, 9m caliber pistol imported by Deerpark, NY, Serial Number: R6664 (attempted to be obliterated)
- American Tactical, Omni Hybrid caliber pistol, bearing an obliterated serial number.

12. Another photograph that was uploaded to the Instagram account associated with JAQUESS JR. is the photograph below. This photograph shows a



large number of firearms, both rifles and pistols, laying on a sheet with no less than six unidentified individuals standing around the firearms (including the unidentified individual that took the photograph). These firearms were positively identified as matching the description of some of the firearms that were stolen from the Westland burglary. Additionally, agents that were present during the execution of the search warrant on Forrer Street, recognize the dresser in the back of the photograph as being present in the basement of the Forrer Street Address where the stolen firearms mentioned above were located. Thus, agents believe this photograph was taken in the basement of the Forrer Street Residence where JAQUESS JR. is known to reside.



### **Conclusion**

13. Based on the aforementioned facts, I submit that there is probable cause showing that Tivon JAQUESS JR, violated Title 18 U.S.C. § 922(j) (Knowingly Possessing Stolen Firearms).

Respectfully Submitted,

A handwritten signature in blue ink, appearing to read "Sherri Reynolds", written over a horizontal line.

Sherri Reynolds, Special Agent  
Bureau of Alcohol, Tobacco, Firearms  
and Explosives

Sworn to before me and signed in my  
presence and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "Anthony P. Patti", written over a horizontal line.

Hon. Anthony P. Patti  
United States Magistrate Judge

Date: September 21, 2022